



DEPARTMENT OF THE ARMY
HEADQUARTERS, 266TH FINANCE COMMAND
UNIT 29001
APO AE 09007

REPLY TO
ATTENTION OF

AEUFC-S2

11 February 2005

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Protection, Control, and Accountability of Keys, Locks, Seals, and Combinations

1. References:

- a. Contained I Physical Security Update 3:
 - (1) AR 190-11, Physical Security of Arms, Ammunition, and Explosives.
 - (2) AR 190-13, The Army Physical Security Program.
 - (3) AR 190-51, Security of Unclassified Army Property (Sensitive and Nonsensitive).
- b. AR 735-5, Policies and Procedures for Property Accountability.
- c. AR 380-5, Department of the Army Security Program.
- d. DOD 7000.14-R, Financial Management Regulation.

2. The purpose of this guidance is to provide commanders, activity chiefs, and key and lock custodians with extracts of regulations and discussions of how key control registers are required to be maintained.

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COL, FC
Commanding

DISTRIBUTION:

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1. **ADMINISTRATIVE KEY CONTROL:**

a. General.

(1) Administrative key control pertains to unclassified Army property (sensitive and non sensitive). AR 190-51 and Appendix D contain the requirements for control of administrative keys and locks, and protective seals. AR 190-11 specifically addresses key and lock control for arms, ammunition and explosives (AA&E) security.

(2) Only approved locks and locking devices (including hasps and chain) may be used. Any questions about locks and lock specifications will be addressed to the DOD Lock Program Technical Manager, Naval Facilities Engineering Service Center, Code C66, 560 Center Drive, Port Phoneme, CA 93043-4328 (DSN 551-1567 or 1212). All questions regarding the identity of approved commercial equivalent locks and locking devices including hasps and chains) will be addressed to the Naval Civil Engineering Laboratory (NCEL), ATTN: Code L56, Port Phoneme, CA 93043-4328.

(3) Under no circumstances will any keys, locks, or alternate keys or locks be placed in a security container that contains or stores classified material.

b. Key Custodian.

(1) A primary and alternate key custodian will be appointed, in writing, to issue, receive, and account for office, unit, or activity keys.

(2) The key custodian will ensure alternates are designated to issue, receive, account for keys in his or her absence, and clearly understand the required procedures.

(3) The key custodian will maintain a key control register at all times to ensure continuous accountability for keys of locks used to secure Government property.

c. Key Control Register.

(1) Keys required by authorized personnel will be signed out, as needed, on a key control register. Personnel will turn-in keys when changing sections, out-processing or when no longer needed.

(2) DA Form 5513-R (Key Control Register and Inventory) is approved for use to meet the requirements of the regulation. If a document other than DA Form 5513-R is used, it must contain all data elements and follow the exact format of the DA Form 5513-R. Electronically generated forms may be used. DA Form 5513-R is available in Form Flow in the shared network files.

(3) When not in use, the key control register will be kept in a locked container that does not contain or store classified material and to which access is controlled.

d. Key Depository.

(1) Keys will be stored in a lockable container, such as a safe or filing cabinet, or a key depository made of at least 26 gauge steel, equipped with a tumbler-type locking device and permanently affixed to a wall.

(2) The key depository will be located in a room where it is under 24-hour surveillance or in a room that is locked when unoccupied. The preferred location of the key depository is in the working area near the key custodian.

e. Approved Locks.

(1) The use of any master key system or multiple keys system is prohibited except as set forth explicitly in a particular regulation. Set locks are an example of a multiple key system.

(2) U.S. Government key-operated, pin-locking deadbolts which project at least 1 inch into the door frame or tumbler-type padlocks (low security padlock, NSN 5340-158-3805 or 5340-158-3807) is approved for use to safeguard unclassified, nonsensitive Army supplies and equipment if a lock is required.

(3) Padlocks and keys not in use are required to be secured in a locked container that does not contain or store classified material. Access to the container will be controlled.

f. Key and Lock Control and Accountability.

(1) Keys and combinations to locks are required to be accounted for at all times.

(2) Keys to locks in use which protect the property of an office, unit, or activity will be checked at the closed of business each duty day. Differences between keys on hand and the key control register will be resolved (each day) before departing the office, unit, or activity.

(3) The key and lock custodian is required to conduct a serial number inventory of locks and their keys semiannually (twice each 12-month period). A written record of the inventory will be retained until the next inventory is conducted.

(4) When a key to a padlock or lock is lost or missing, an inquiry (see AR 735-5, Chapter 13 for conducting a "Report of Survey") will be conducted and the padlock replaced or recorded immediately.

(5) The key and lock custodian are required to maintain a key and lock inventory list (key control register) which includes the following:

- (a) Serial number of each key.
- (b) Location of each lock.
- (c) The number of keys maintained for each lock.

(6) Padlocks and their keys which do not have a serial number will be given one. The serial number is required to be inscribed on the lock or key as appropriate. Normally, the serial number is inscribed on the key only.

2. **ARMS, AMMUNITION, AND EXPLOSIVES (AA &E) KEY CONTROL:**

g. General.

(1) To ensure continuous accountability, the unit key and lock custodian should not be authorized unaccompanied access to the arms room or arms storage facility.

(2) The regulation requires that only approved locks and locking devices (including hasps and chain) be used.

(3) Under no circumstance will any key, lock, or alternate keys or locks be placed in a security container that contains or store classified material.

(4) Keys and locks for AA&E storage facilities, arms racks, or key containers will not be removed (taken off post) from Tompkins Barracks except to provide protection for AA&E stored elsewhere.

(5) Keys to AA&E storage buildings, rooms, racks, and containers will be maintained separately from other keys, and accessible only to those individuals whose official duties require access to them.

(6) The alternate set of keys may be stored at the unit, or they may be stored at the next higher headquarters or at a comparable unit. The person receiving the alternate set of keys will sign for a sealed container of keys.

h. Key and Lock Custodian (AA&E).

(1) A key and lock custodian will be appointed, in writing, to control AA&E keys and locks. Generally, the AA&E key and Lock Custodian is the same person as the Key Custodian (administrative keys), but the appointment orders must specifically indicate Key and Lock Custodian (AA&E), authority AR 190-11.

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(2) Only the commander and the key custodian (or alternate, if appointed) will issue and receive keys to and from individuals on the key access roster (unaccompanied access roster).

(3) Personnel on the roster may transfer custody, in writing, among themselves.

(4) The key and lock custodian will maintain a record to identify each key and lock and combination to locks used by the activity. The record will show the current location and custody of each key and lock.

(5) Key and lock custodians, and their alternates are required to undergo a command oriented security screening (DA Form 7281) before being appointed (see AR 190-11, para 2-11).

i. Key Control Register.

(1) Keys will be signed out to authorized personnel, as needed, on a key control register.

(2) DA Form 5513-R (Key Control Register and Inventory) is approved for use to meet the requirements of the regulation. An electronically generated form may be used; however the electronically generated form must contain all data elements and follow exact format of the existing printed form. The form number of the electronically generated form will be shown, as DA Form 5513-R-E, and the date will be the same as the date of current edition of the printed form.

(3) A key control register will be maintained at the unit level to ensure continuous accountability for keys, ensure positive control of keys, and establish responsibility for custody of stored AA&E.

(4) Key control registers will contain printed name and signature of the individual receiving the key, date and time of issuance, serial number or other identifying information of the key, printed name and signature of the person issuing the key, date and time the key was key, printed name and signature of the person issuing the key, date and time the key was returned, and the printed name and signature of the individual receiving the returned key.

(5) Completed key control registers will be retained in the unit files for a minimum of 90 days.

(6) When not in used, the key control register will be kept in a locked container that does not contain or store classified material and to which access is controlled.

d. Key Depository.

(1) AA&E keys will be stored in a container of at least 20 gauge steel or material of equivalent strength, and equipped with GSA-approved security padlock or a GSA-approved built-in three position changeable combination lock, or a Class 5 or Class 6 approved three position, changeable combination container that does not contain or store classified material.

(2) Key containers weighing less than 500 pounds will be fastened to the structure with bolts or chains equipped with secondary padlocks to preclude easy removal.

(3) Under no circumstance will AA&E keys and locks, or alternate keys and locks be placed in any security container that contains or stores classified material.

e. Approved Locks and Chains.

(1) The use of any master key system or multiple keys system is prohibited.

(2) High security padlocks. Military Specifications MIL-P-43607, shrouded shackle with clevis and chain, NSN 5340-01-217-5086 or NSN 5340-00-188-1560; horizontal sliding bolt with clevis and chain, NSN 5340-00-799-8248.

(3) Low security padlocks. Commercial Item Description A-A-1927, hardened steel shackle and case, without chain NSN 5340-00-158-3805; with chain: 5340-00-158-3807.

(4) Chains used to secure racks and containers will be of heavy-duty, hardened steel chain, welded, straight-link steel. The steel will be galvanized of at least 5/16 inch thickness or of equal resistance required to force, cut or break an approved low security padlock. An example of such a chain is Type 1, Grade C, and Class 4 NSN 4010-149-5583.

(5) Except for GSA approved Class 5 steel vault doors with built-in, three positions, changeable combination locks, doors used for access to arms storage rooms or structures will be locked with an approved high security padlock and hasp providing comparable protection to the lock. On existing facilities equipped with double-door protection, a high security padlock and hasp will be used on the most secure door. A low security padlock will be used to secure the other door.

(6) Racks and storage containers will be locked with approved low security padlocks.

(7) Chains used to secure racks and containers will be locked with approved low security padlocks.

f. Key and lock control and accountability.

(1) Keys and combinations to locks will be accounted for at all times.

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(2) The key and lock custodian will maintain a record (key control register and inventory) to identify each key and lock and combination used, including replacement or reserve keys and locks. The record will show the current location and custody of each key and lock.

(3) The key control register and inventory will depict the following:

- (a) Serial number of each key.
- (b) Location of each lock.
- (c) The number of keys maintained for each lock.

(4) When not in use, the key control register and inventory will be secured in the key depository. Padlocks and their keys will be inventoried semiannually. The inventory records will be retained in unit files for a minimum of one year.

(5) Padlocks and their keys that do not have a serial number will be given one. The serial number is required to be inscribed on the lock or key as appropriate. Normally, the serial number is inscribed on the key only.

(6) Replacement or reserve locks, cores, and keys will be secured to preclude access by unauthorized individuals.

(7) The key and lock custodian will conduct a serial number inventory of padlocks and their keys semiannually. Inventory records will be retained for one year.

(8) When a key to a padlock is lost or missing, an inquiry (see AR 735-5, Chapter 13 for conducting a "Report of Survey") will be conducted and the padlock replaced or recorded immediately.

g. Change of Custody.

(1) When individuals such as the SDO or SDNCO are charged with the responsibility for safeguarding or otherwise having the operational set of AA&E keys available, he or she will sign for a sealed container of keys. A sealed container of keys is a locked and sealed metal container containing the keys. The armorer or person turning in the sealed container of keys should place the keys in the container, and lock and seal the container in the presence of the individual receiving the container of keys. The SDO or SDNCO will then sign for a sealed container or keys using a DA Form 5513-R. The armorer (or individual who turned in the container) will keep the DA Form 5513-R containing the serial number of the seal and other required information for proof of relinquishing custody of a sealed container of keys to the SDO or SDNCO should annotate the transaction on DA Form 1594, Staff Duty Journal.

(2) When a locked and sealed container of keys is turned in to the SDO or SDNCO at the close of business and retrieved later by the same person, responsibility for custody of the

keys did not change; therefore, a change of custody inventory (physical count of arms, ammunition and explosive and completion of DA Form 2062) is not required. If the locked and sealed container is retrieved from the SDO or SDNCO by an individual other than the person who originally turned in the container, the two persons procedure to inventory and verify the quantity of keys in the container, open the arms room, and inventory and verify the quantity of weapons and other sensitive items stored in the arms room. Both individuals will then sign the DA Form 2062 to verify the physical count.

(3) Unit commanders may elect to have the unit armorer return the operational set of keys to the unit key and lock custodian at the close of business each day for storage in the key depository. When the operational set of keys is returned to the unit key and lock custodian at the close of business each day, a change of custody inventory of the arms room must be conducted. Note: Only if the unit key and lock custodian is authorized unaccompanied access to the arms room. Both the unit armorer and the key and lock custodian must conduct a physical count of weapons, ammunition, and other sensitive items stored in the arms room. The results of the inventory will be recorded on a DA Form 2062. The key custodian will sign the hand receipt in the column where the inventory quantity is listed. The same procedures will be used when the keys are returned to the armorer or another person on the unaccompanied access roster. Change of custody inventories (DA Form 2062) will be retained until the next serial number inventory (which is required monthly) is completed.

3. **FINANCE AND ACCOUNTING OFFICES KEY CONTROL:**

a. Administrative keys, locks, and combinations.

Keys, locks, and combinations used to provide protection for administrative areas will be controlled in accordance with procedures contained in AR 190-51. appendix D (see paragraph 1).

b. Safeguarding Keys and Combinations.

(1) The Disbursing Officer or designee is required to make a personal inspection (and maintain records of such inspections) of office security measures to ensure that (DOD 7000.14-R, para 030302B):

a. Keys to the workspace or disbursing office will be strictly controlled. A record will be maintained that identifies who has keys, when they were last issued, and when they were surrendered per DOD Reg 7000.14-R, para 030302.B.17. (DA Form 5513-R, Key Control Register and Inventory, is recommended for use to meet the requirements of the regulation).

b. The combination of all vaults, safes, and fund containers will be changed **at least once every 6 months** and upon relief, transfer, separation, or discharge of accountable individuals per DOD Reg 7000.14-R, para 030302.B13.

(2) Complete guidance concerning “Keeping and Safeguarding Public Funds” is contained in DOD 7000.14-R-Vol 5, chapter 3.

4. **COMBINATIONS:**

a. General.

Only individuals having that responsibility and an appropriate clearance will change combinations to all security containers. The following activity is responsible for changing combination within: Heidelberg, Mannheim, Kiaserslautern, Wiesbaden and Darmstadt: Furniture Repairs Operations (FRO) Service Desk at DSN 375-7386.

b. Required Changing of Combinations. Combinations to locks on vault doors or GSA-approved Class 5 or 6-security container will be change as follows:

- (1) When placed in use.
- (2) Whenever an individual having the combination no longer requires access.
- (3) When the combination has been subject to possible compromise.
- (4) At least annually (unless required to be change more frequently by a specific regulation).
- (5) When taken out of service. Built-in combination locks shall be reset to the standard combination 50-25-50.

c. Required Recording of Storage Facility Data.

A record will be maintained for each vault and container showing location of vault or container, the name, home address, and home telephone of the individuals having knowledge of the combination. Standard Form 700, “Security Container Information” will be used for this purpose.

- (1) Complete Part 1 and Part 2A, SF 700 (including the name and signature of the person making the combination in Item 9, Part 1).
- (2) Part 1, SF 700 will be posted inside of the locked drawer of the security container (Part 1, SF 700 will be posted on the inside of vaults, and arms rooms equipped with Class 5 or 6 vault door).

(3) The combinations of vault door locks or container locks will be annotated on Part 2A, SF 700. Part 2 will be detached and inserted in the envelope (Part 2, SF 700).

(4) Part 2, SF 700 will be stored in a different security container. No other record of the combination will be kept. Controls will be established to ensure the envelope containing combinations to locks and containers are not made available to unauthorized personnel. See AR 380-5, paragraph 5-104 for complete guidance concerning “combinations to safes, and combinations to locks on doors of vault and containers.”

5. USES AND CONTROL OF PROTECTIVE SEALS:

a. Purpose of Seals.

The purpose of the seal is to show whether the integrity of a storage facility, vehicle, or rail shipment, or container has been compromised. A plain seal is not a lock, although combination items referred to as “seal-locks” are available. The purpose of a seal, no matter how well constructed, is defeated if strict accountability and discipline are not maintained.

b. Ordering and Storing Seals.

Seal conduction specification should include:

(1) Durability: Seals must be strong enough to prevent accidental breakage during normal use.

(2) Design: Seals must be sufficiently complex to make unauthorized manufacture of a replacement seal difficult.

(3) Tamperproof: Seals must readily provide visible evidence of tampering and be constructed in a way that makes simulated locking difficult once the seal has been broken.

(4) Individual identifiable: Seals must have embossed serial numbers and the owner identification.

(5) Ordering and issuing: A single office on an installation is required to be responsible for ordering and issuing seals; seals can be order thru your supply SGT (Seals stock # is 5340-00-901-8105). The source for seals will be instructed to ship the seals to the attention of a seal custodian at that office.

(6) Unused seals: Seals not issued for actual use will always be secured in a locked, metal container with controlled access. Only seal custodian and alternate will have access. Recorded monthly inventories will be conducted to preclude undetected loss of seals.

c. Accounting for seals.

Seal custodians will maintain seal logbooks, preferably in hard cover, rather than in loose-leaf books.

(1) Issuing of seals to using office, unit or activity custodian will reflect date of issue, name of recipient, and seal serial numbers.

(2) Issue of a seal for actual use by a custodian will reflect the seal number, date and time applied, identification of items to which applied (and location of item if other than main door(s), and the name of the person applying the seal. For outbound loaded trailers, tailraces, and container shipments, the appropriate trailer, railcar, or container number and load destination will be noted.

d. Application of Seals.

(1) Seal all doors and openings, not merely the main one.

(2) Run seal strap only once through the hasp. Seals wrapped around the hasp several times become illegible.

(3) Listen for the “click” when inserting point of the seal into the sheath.

(4) To ensure positive closure, tug down on strap and twist the point of the seal into the sheath.

e. Checking Seals.

Commands using seals are required to develop procedures for checking them. The procedures will include actions to be taken to break a seal and action to be taken upon finding a broken seal.

f. Disposition of Used Seals

(1) All shipping documents will reflect seal number(s). All seals will be verified with seal log, shipping documents, or other appropriate documents before removal and disposal.

(2) Seals must be defaced sufficiently upon removal so that they cannot be used to simulate a good seal. They may be disposed of in normal trash.

6. **ACCOUNTING FOR LOST KEYS.**

a. When a person loses a key due to negligence or willful misconduct, he or she will be assessed financial liability for the lost key.

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b. When the loss of a key through negligence or willful misconduct is the proximate cause of replacing a locking devices or door by rendering the locking device or door unsuitable for its intended purpose, the respondent will be held financially liable for the replacement cost of the locking device and/or door.

c. See AR 735-5, chapter 13 for conducting a “Report of Survey”.